

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR PERMIT MINOR REVISION (FINAL) No. F-04-021 R3

DIXIE CONSUMER PRODUCTS, LLC.

LEXINGTON, KY.

DECEMBER 20, 2007

MARK LABHART, REVIEWER

PLANT I.D. # 021-067-00052

Agency Interest: 1051

Activity I.D.: APE20070001

F-04-021 R3:

Dixie Consumer Products is adding (1) additional polystyrene extruder line for production of cup lids. The source is also modifying an existing polypropylene extruder to process polystyrene in addition to polypropylene. VOC and PM potential emissions decrease slightly when processing the alternative material, but total HAP (styrene and ethyl benzene) emissions potential increase by 3.6 tpy. Total emission potential increase is 3.4 tpy VOC, 3.4 tpy styrene, 3.4 tpy ethyl benzene, and 0.9 tpy for particulates.

F-04-021 R2:

Name change only.

F-04-021 R1:

The source is now planning the addition of a new flexographic press. This press will be a replacement for one of the existing presses, however the old press will not be removed until the new press is operational. Included with new press will be two (2) natural gas fired dryers. The dryers are classified as insignificant activities. Two other insignificant activities are being added to the permit. These are two (2) Diesel IC Engines, one to be used for a Fire Fighting Water Pump and the other for an Emergency Generator.

SOURCE DESCRIPTION:

Fort James Operating Company is a wholly owned subsidiary of the Georgia Pacific Corporation. The source manufactures disposable, sanitary, food and beverage containers (paper and plastic). Emissions units at the facility are (2) flexographic presses emitting VOC, (4) polystyrene extruders emitting HAP and VOC, and (5) polypropylene extruders that emit VOC and PM. Various heating devices emit criteria pollutants, NOx and CO at approximately 50% of major source thresholds, and there are PM emissions from various material handling processes. Insignificant activities include truck unloading and packaging operations including bagging operations and sealing cartons.

COMMENTS:

- A material balance was used for calculation of PTE for the new press. The source will continue to use the same water based inks with the new press that are used in the existing presses.

EMISSION AND OPERATING CAPS DESCRIPTION:

Fort James Operating Company has requested voluntary permit limits of 9.0 tons per year or less of individual hazardous air pollutants (HAP) and 22.5 tons per year or less of combined HAPs. Potential VOC emissions are 60.8 TPY. No Conditional Major limitations are required for VOC.

OPERATIONAL FLEXIBILITY:

Fort James Operating Company is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.